

Dr. Taranisia MacCannell  
Division of Healthcare Quality Promotion  
Centers for Disease Control and Prevention  
1600 Clifton Rd  
Atlanta, GA 30333

**DRAFT GUIDELINE FOR THE PREVENTION AND CONTROL OF  
NOROVIRUS GASTROENTERITIS OUTBREAKS IN HEALTHCARE  
SETTINGS.**

Dear Dr. MacCannell:

Attached is a copy of an email sent to the CDC containing comments on the above referenced documents. Unfortunately the email system at CDC rejected the email sent. I have attached a copy of the comments in the hope that they could be considered for the final document.

Regards

Mark Hodgson

Attachment:

Sir

My thanks for this excellent draft document, however, on two matters I would comment as follows:

## Environmental Cleaning

Pages 13/14

Section 3.B.1 and 3.C.12a

Your reference to use of an EPA registered disinfectant and cleaning agents with efficacy against Norovirus should be expanded to include use of EPA registered sterilants found on approved products list A

([http://www.epa.gov/oppad001/list\\_a\\_sterilizer.pdf](http://www.epa.gov/oppad001/list_a_sterilizer.pdf)). Any product that is a registered sterilant will deactivate viral particle when used in accordance with the manufacturers labeling instructions. Pointing the user to only those products that are registered as disinfectants may inadvertently exclude a number of products that have value in sterilizing surfaces and equipment.

The US EPA states that:

***"Public health products** are intended to control microorganisms infectious to humans in any inanimate environment. The more commonly used public health antimicrobial products include the following:*

***Sterilizers (Sporicides):** Used to destroy or eliminate all forms of microbial life including:*

- *fungi,*
- *viruses,*
- *all forms of bacteria and their spores.*

*Spores are considered to be the most difficult form of microorganism to destroy. Therefore, EPA considers the term Sporicide to be synonymous with "Sterilizer." ([http://www.epa.gov/oppad001/ad\\_info.htm](http://www.epa.gov/oppad001/ad_info.htm))"*

As such any EPA registered Sterilant should be included in the available products for use in cleaning rooms impacted by a patient with Norovirus infections.

We would also draw to the attention of the committee the fact that there are a number of Sterilizer products that are registered for use on both hard (non porous) surfaces and soft porous fabrics.

Within the guideline the committee recommends

Section 12.d.2 recommends steam cleaning of upholstered furniture

Section 12.d.3 recommends change of privacy curtains

Several sterilants, such as hydrogen peroxide vapor, have EPA registration that includes soft fabrics such as privacy curtains and have demonstrated efficacy against spore forming bacteria in carpet. Hydrogen peroxide vapor, used in accordance with the manufacturers labeling instructions, should be offered as an alternate to steam cleaning for carpets, upholstered furniture, and privacy curtains.

If you have any questions regarding the above please do not hesitate to contact the undersigned. I would be happy to provide copies of any technical literature or EPA labeling that the committee may need.

Thanks

**Mark Hodgson**  
Head of Sales Healthcare  
Bioquell, Inc.

T: 215-435-7906  
F: 215-682-0395  
E: [mark.hodgson@bioquell.com](mailto:mark.hodgson@bioquell.com)  
W: [www.bioquell.com](http://www.bioquell.com)

